

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL MORGAN and LIBERTY RISK
CONSULTING, LLC, and
INFLUENCED EDGE, LLC

Civil Action No.
2:22-cv-1631

Plaintiffs,

v.

AMY NOSS, KEITH HICKEY,
JOYCE MORGAN, BRITTANY PADUGANAN
And ETBP ENTERPRISES, LLC d/b/a THRIVE
TALENT MANAGEMENT

Defendants.

CERTIFICATE MEET AND CONFER RE MOTION TO DISMISS

I certify that I have made good faith efforts to confer with Plaintiffs' counsel to determine whether the identified pleading deficiencies properly could be cured by amendment. On December 28, 2022, I reached out to Plaintiffs' counsel regarding alleged deficiencies in the original complaint. On January 4, 2023, I conferred with Plaintiffs' counsel via phone regarding the deficiencies and Plaintiffs' counsel agreed to amend the complaint. On February 3, 2023, Plaintiffs filed an Amended Complaint with Defendants' consent. On February 10, 2023, I notified Plaintiffs' counsel via email of the issues regarding the Amended Complaint. On February 13, 2023, counsel for Plaintiffs notified me that Plaintiffs did not intend to amend the complaint again.

Date: 2/17/2023

/s/ Rachel L. McElroy

Rachel L. McElroy, Esq.